

Attachment A

Wrongful Discharge and Workplace Harassment Charge

On June 13, 2017, a former HCTC employee filed a lawsuit in Kerr County District Court for wrongful discharge and workplace harassment based on national origin discrimination. The suit was served on HCTC on June 20, 2017. Because the state court suit alleged violation of federal law, HCTC removed the case to federal court, and filed its notice of removal in the U.S. District Court, Western District of Texas – San Antonio Division on July 18, 2017.

After completing written discovery, HCTC took the former employee's deposition on December 1, 2017, and then filed on January 11, 2018 a partial Motion to Dismiss the workplace harassment claims based on failure to exhaust administrative remedies. The judge granted that motion on January 29, 2018. HCTC's defense team filed a Motion for Summary Judgment on April 4, 2018, requesting dismissal of the former employee's remaining discrimination claims for failure to present evidence disputing HCTC's legitimate business reason for the termination: excessive tardiness. The former employee responded to HCTC's motion on April 16, 2018, to which HCTC replied on April 23, 2018.

The matter was dismissed in its entirety by the District Court on June 5, 2018, and all avenues for appeal have been foreclosed.

EEOC Charge

On March 11, 2019, a current HCTC employee filed a charge of discrimination with the federal Equal Employment Opportunity Commission (EEOC), alleging sex and disability discrimination, harassment and retaliation under Title VII of the Civil Rights Act and the Americans with Disabilities Act. HCTC received notice of the charge on March 28, 2019. Through its attorneys, HCTC filed a timely position statement with the EEOC on May 10, 2019, denying the allegations, and is awaiting response at this time.